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22 Attorneys for Defendants C. R. Bard, Inc. and
23 Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

16 IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**NOTICE OF SUBMISSION OF
SECOND AMENDED CASE
MANAGEMENT ORDER NO. 4
RE: MASTER COMPLAINT,
MASTER RESPONSIVE
PLEADING, USE OF SHORT FORM
COMPLAINT, WAIVER OF
SERVICE FOR BARD
DEFENDANTS, AND ANSWER AND
GENERAL DENIAL IN CASES
SUBSEQUENTLY TRANSFERRED
TO MDL 2641**

25 Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
26 "Bard") submit a proposed form of Second Amended Case Management Order No. 4, to
27 address the Master Complaint, Master Responsive Pleading, use of Short Form
28 Complaint, waiver of service for Bard Defendants, and answer and general denial in cases

1 subsequently transferred to MDL 2641. The purpose of the proposed amendment is to
2 correct an error in the Short Form Complaint and Amended Short Form Complaint;
3 specifically, the Short Form Complaint and Amended Short Form Complaint mistakenly
4 classify the G2® Express and G2® X Vena Cava Filters as synonymous when in fact they
5 are separate and distinct models. The form of order and attached Second Amended Short
6 Form Complaint are agreed and stipulated to by the parties.

7 This 15th day of April, 2016.

8 s/Richard B. North, Jr.
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29 **Attorney for Defendants C. R. Bard, Inc. and**
30 **Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2016, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

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